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Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

## UNITED STATES DISTRICT COURT

for the

District of Maryland



\_\_\_\_ Division

GARY JAMES

Case No.

i'DKC 24CV2058

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

FRANKLIN PARK AT GREENBELT STATION  
EMPIRIAN VILLAGE OF MARYLAND, LLC  
FIELDSTONE PROPERTIES, LLC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT AND REQUEST FOR INJUNCTION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	GARY JAMES
Street Address	c/o 9106 EDMONSTON COURT, #202
City and County	GREENBELT, PRINCE GEORGE'S COUNTY
State and Zip Code	MARYLAND, 20770
Telephone Number	2404327538
E-mail Address	semaj6311@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name FRANKLIN PARK AT GREENBELT STATION  
Job or Title *(if known)*  
Street Address 9230 SPRINGHILL LANE  
City and County GREENBELT, PRINCE GEORGE'S COUNTY  
State and Zip Code MARYLAND, 20770  
Telephone Number 301 474-1602  
E-mail Address *(if known)*

Defendant No. 2

Name EMPIRIAN VILLAGE OF MARYLAND, LLC  
Job or Title *(if known)*  
Street Address 1209 ORANGE STREET  
City and County WILMINGTON, NEW CASTLE COUNTY  
State and Zip Code DELAWARE, 19801  
Telephone Number  
E-mail Address *(if known)*

Defendant No. 3

Name FIELDSTONE PROPERTIES, LLC  
Job or Title *(if known)*  
Street Address STATE ROUTE #10, SUITE #220  
City and County PARSIPPANY, MORRIS COUNTY  
State and Zip Code NEW JERSEY, 07054  
Telephone Number 973-455-8882  
E-mail Address *(if known)*

Defendant No. 4

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question ☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.  
N/A

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, *(name)* GARY JAMES, is a citizen of the  
State of *(name)* MARYLAND.

## b. If the plaintiff is a corporation

The plaintiff, *(name)* N/A, is incorporated  
under the laws of the State of *(name)* N/A,  
and has its principal place of business in the State of *(name)*  
N/A.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

## 2. The Defendant(s)

## a. If the defendant is an individual

The defendant, *(name)*, is a citizen of  
the State of *(name)*. Or is a citizen of  
*(foreign nation)*.

- b. If the defendant is a corporation

The defendant, (name) FRANKLIN PARK AT GREENBELT STATION, is incorporated under the laws of the State of (name) DELAWARE, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

DEFENDANT OWES PLAINTIFF ACTUAL AND STATUTORY damages FOR 63-PLUS VIOLATIONS OF 15 USC 1692c, 1692g, 1692h, 1692e, 1692f, not limited to 18 USC 1028, 1028a, 18 USC 1001, 18 USC 1341, and MD Comm. Law, Sales Install. Agreements, Sec. 12-605, MD C.P.A., Civil Money Penalty, Sec. 13-410, MD Criminal Law, Identity Fraud, Sec. 8-301, MD UCC 3-311 Accord & Satisfaction, which counts over \$45M dollars in damages

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

THE EVENTS GIVING RISE TO THE PLAINTIFF'S CLAIM AROSE IN GREENBELT MARYLAND, AT THE COMPANY IDENTIFIED AS: 'FRANKLIN PARK AT GREENBELT STATION', LOCATED AT, 9230 SPRINGHILL LANE, GREENBELT MD 20770.

FRANKLIN PARK AT GREENBELT STATION FAILED TO UPHOLD ITS DUTY AND OBLIGATION TO 15 USC 1692g, VIOLATED ITS DUTY AND CAUSED GARY JAMES TO BE FINANCIALLY HARMED.

- B. What date and approximate time did the events giving rise to your claim(s) occur?

ON MARCH 4 2024 thru APRIL 4 2024, INCLUDING TO DATE, THE 63-plus CLAIMS OF VIOLATIONS BY THE DEFENDANT HAVE OCCURRED AND HAVE UNLAWFULLY, CONTINUOUSLY BEEN ONGOING.



- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*  
THE PLAINTIFF SIGNED A RENTAL LEASE THAT THE DEFENDANT FAILED TO SIGN, WHICH CONSTITUTE A BREACH OF CONTRACT. THE PLAINTIFF INITIATED A DEBT VALIDATION DISPUTE IN PURVIEW OF 15 USC 1692g, WHICH THE DEFENDANT GROSSLY FAILED TO VALIDATE AND VERIFY. DEFENDANT HAVE UNLAWFULLY TRANSFERRED PLAINTIFF'S PERSONAL IDENTIFYING INFORMATION TO A STATE COURT WITHOUT PLAINTIFF'S CONSENT OR AUTHORIZATION. PLAINTIFF HAVE SENT DEFENDANT AFFIDAVITS TO CEASE & DESIST FROM COLLECTING ON THE DEBT UNTIL VERIFICATION AND VALIDATION HAS BEEN COMPLETED. DEFENDANT HAS HARMED PLAINTIFF BY HAVING STATE COURT ENTER 2 PREVIOUS JUDGEMENTS IN THE DEFENDANT'S FAVOR, EVEN THOUGH ALLEGED DEBT IS IN A LEGAL DISPUTE, OUTSIDE ANY VALID LEGAL CONTRACT. DEFENDANT IS THREATENING TO EVICT PLAINTIFF OUTSIDE ANY LEGAL CONTRACT. ALLEGED DEBT, TO DATE IS NOT VERIFIED.
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#### IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

DEFENDANT WILL CAUSE IRREPARABLE INJURY TO THE PLAINTIFF, BY EVICTION UNDER UNLAWFUL AND ILLEGAL CRIMINAL MEANS, CAUSING THE PLAINTIFF TO BE HOMELESS, WHICH NO MONETARY DAMAGE CAN SUFFICE FOR, DUE TO BREACH OF CONTRACT OF A NON-EXISTENT RENTAL LEASE CONTRACT BY THE DEFENDANT RECKLESS AND NEGLIGENT ACTIONS/VIOLATIONS. THE PLAINTIFF HAVE ALREADY SUSTAINED 2-UNLAWFUL STATE COURT JUDGEMENTS, IS ON THE VERGE OF AN UNLAWFUL IMMINENT EVICTION AND NEEDS THIS HONORABLE COURT TO STAY ANY AND ALL UNLAWFUL DECEPTIVE AND UNFAIR PRACTICES THE DEFENDANT IS CURRENTLY UTILIZING AGAINST THE PLAINTIFF, WHICH IS CAUSING THE PLAINTIFF MENTAL EMOTIONAL STRESS AND INJURY AND THE LIKE, AND PLAINTIFF IS REQUESTING THE COURT TO ORDER AN EMERGENCY INJUNCTION TO PREVENT FURTHER HARM AND INJURY TO THE PLAINTIFF.

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#### V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

VIOLATION OF RIGHTS: THE DEFENDANT'S ACTIONS HAVE VIOLATED THE PLAINTIFF'S RIGHTS . THE SPECIFICS OF THESE VIOLATIONS ARE DETAILED IN THE ATTACHED : 'MOTION FOR DEFAULT\* JUDGEMENT, AND MOTION INJUNCTIVE RELIEF, AND MOTION FOR DAMAGES',...SEE ATTACHED, PARAGRAPH IV. RELIEF SOUGHT

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07/14/2024

Signature of Plaintiff

by:  /s/ James: Gary-/Attorney-In-Fact All Rights Reserved, Without F

Printed Name of Plaintiff

for: PRINCIPAL GARY JAMES

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Street Address \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_